## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-GUERRA, MICHAEL MAERLENDER, BRANDON PIYEVSKY, BENJAMIN SHUMATE, BRITTANY TATIANA WEAVER, and CAMERON WILLIAMS, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA
INSTITUTE OF TECHNOLOGY, UNIVERSITY
OF CHICAGO, THE TRUSTEES OF COLUMBIA
UNIVERSITY IN THE CITY OF NEW YORK,
CORNELL UNIVERSITY, TRUSTEES OF
DARTMOUTH COLLEGE, DUKE UNIVERSITY,
EMORY UNIVERSITY, GEORGETOWN
UNIVERSITY, THE JOHNS HOPKINS
UNIVERSITY, MASSACHUSETTS INSTITUTE
OF TECHNOLOGY, NORTHWESTERN
UNIVERSITY, UNIVERSITY OF NOTRE DAME
DU LAC, THE TRUSTEES OF THE
UNIVERSITY OF PENNSYLVANIA, WILLIAM
MARSH RICE UNIVERSITY, VANDERBILT
UNIVERSITY, and YALE UNIVERSITY,

Defendants.

Case No.: 1:22-cv-00125

Hon. Matthew F. Kennelly

MOTION BY PLAINTIFFS FOR AN ENLARGEMENT OF THE PAGE LIMIT FOR PLAINTIFFS' MEMORANDUM OF LAW IN SUPPORT OF SETTLEMENT CLASS COUNSEL'S MOTION FOR SERVICE AWARDS FOR THE CLASS REPRESENTATIVES, REIMBURSEMENT OF EXPENSES, AND ATTORNEYS' FEES

Pursuant to Northern District of Illinois Local Rule 7.1, Plaintiffs respectfully seek leave to file a Memorandum of Law ("Memorandum") that exceeds 15 pages in length (totaling 25

pages) in support of a Motion for Service Awards for the Class Representatives, Reimbursement of Expenses, and Attorneys' Fees.

- 1. The Court's February 28, 2024 Preliminary Approval Order entered a schedule for completing the settlement process for the preliminarily approved settlements between Plaintiffs and 10 of the defendants. ECF 638.
- 2. Pursuant to ¶ 20.b. of the Preliminary Approval Order, Plaintiffs intend to file a motion for service awards for the class representatives, reimbursement of expenses, and attorneys' fees on April 29, 2024.
- 3. Plaintiffs respectfully seek leave of the Court to file a Memorandum in excess of 15 pages to summarize settlement class counsel's litigation efforts and address the standards for awards for the class representatives, reimbursement of class counsel's costs and expenses, and an award of reasonable attorneys' fees.
- 4. Plaintiffs' counsel conferred with Defendants' counsel regarding this Motion. No Defendant indicated opposition.

WHEREFORE, for the reasons stated above, Plaintiffs respectfully request that the Court grant this Motion and permit Plaintiffs to file a Memorandum that is 25 pages in length.

Dated: April 24, 2024

### /s/ Robert D. Gilbert

Robert D. Gilbert Elpidio Villarreal Robert S. Raymar David Copeland Steven Magnusson Natasha Zaslove

## GILBERT LITIGATORS & COUNSELORS, P.C.

11 Broadway, Suite 615
New York, NY 10004
Phone: (646) 448-5269
rgilbert@gilbertlitigators.com
pdvillarreal@gilbertlitigators.com
rraymar@gilbertlitigators.com
dcopeland@gilbertlitigators.com
smagnusson@gilbertlitigators.com
nzaslove@gilberlitigators.com

#### /s/ Eric L. Cramer

Eric L. Cramer Ellen T. Noteware David Langer Jeremy Gradwohl

#### **BERGER MONTAGUE PC**

1818 Market Street, Suite 3600 Philadelphia, PA 19103 Tel: 215-875-3000 ecramer@bm.net enoteware@bm.net

dlanger@bm.net jgradwohl@bm.net

### Richard Schwartz

### **BERGER MONTAGUE PC**

1720 W Division Chicago, IL 60622 Tel: 773-257-0255 rschwartz@bm.net

#### Respectfully Submitted,

/s/ Edward J. Normand

Devin "Vel" Freedman Edward Normand Richard Cipolla

Joseph Delich

Peter Bach-y-Rita

## FREEDMAN NORMAND FRIEDLAND LLP

99 Park Avenue Suite 1910 New York, NY 10016 Tel: 646-350-0527 vel@fnf.law tnormand@fnf.law rcipolla@fnf.law jdelich@fnf.law pbachyrita@fnf.law

#### Ivy Ngo

# FREEDMAN NORMAND FRIEDLAND LLP

1 SE 3d Avenue Suite 1240 Miami, FL 33131 Tel: 786-924-2900 ingo@fnf.law

Daniel J. Walker Robert E. Litan Hope Brinn

### **BERGER MONTAGUE PC**

1001 G Street, NW Suite 400 East Washington, DC 20001 Tel: 202-559-9745 rlitan@bm.net dwalker@bm.net hbrinn@bm.net

Counsel for Plaintiffs